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MEMO ENDORSED

January 6, 2025

BY ECF

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: Todd C. Bank v. NFL Properties LLC, No. 1:24-cv-08814-CM

Dear Judge McMahon:

I write on behalf of Defendant NFL Properties LLC. Over the holidays, I discovered a health-related issue and as a result my schedule over the next month is uncertain. I have conferred with Plaintiff and he is amenable to extending all deadlines in the case by 30 days. This extension is needed because my situation is interfering with Defendant's ability to prepare its response to the Complaint. In addition, the extension will allow me to determine whether I will need to have another colleague appear in this matter to represent Defendant. The requested extension will not affect any scheduled dates other than those set forth below. Accordingly, Defendant requests that the following deadlines be extended as follows:

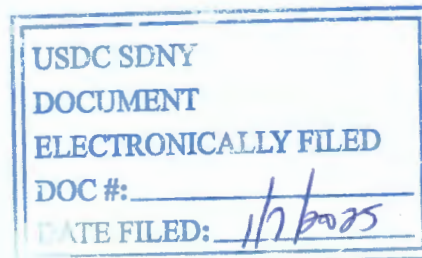
- Defendant's deadline to respond to the Complaint: Extended from January 13, 2025 to February 12, 2025
- Plaintiff's deadline to oppose Defendant's anticipated motion: Extended from February 10, 2025 to March 12, 2025
- Defendant's deadline to file its reply: Extended from February 24, 2025 to March 26, 2025
- Initial pre-trial conference: Conference currently scheduled for January 31, 2025 adjourned to March 3, 2025, or such date thereafter that is convenient for the Court

The Court previously extended Defendant's time to respond to the Complaint and entered the parties' proposed briefing schedule for Defendant's anticipated motion to dismiss.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Jeff Warshafsky
Jeff Warshafsky



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1/7/2025
OK. Having read the
complaint, I assume the
response will be a motion
to dismiss possibly
for sanctions
since the
plaintiff is an
attorney. The
independent
will be
held after
the
motion
is
decided -
if at that
point
any
conference
is
necessary
AW